

1 Timothy M. Ryan, Bar No. 178059
 2 tryan@theryanfirm.com
 3 Barry G. Coleman, Bar No. 75383
 4 bcoleman@theryanfirm.com
 5 THE RYAN FIRM
 6 A Professional Corporation
 7 1100 N. Tustin Avenue, Suite 200
 8 Anaheim, California 92807
 9 Telephone (714) 666-1362; Fax (714) 666-1443

10 Attorneys for Defendant FREMONT INVESTMENT AND LOAN

11 **IN THE UNITED STATES DISTRICT COURT**
 12 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

THE RYAN FIRM
 A Professional Corporation

11 TIMOTHY LOSACCO, an individual;
 12 FLORENCE LOSACCO, an
 13 individual,

14 Plaintiffs,

15 vs.

16 FREMONT INVESTMENT & LOAN,
 17 a California corporation; and DOES 1-
 18 10, inclusive,

19 Defendants.

CASE NO.: 3:08-cv-00810-JM-POR
 Date Action Filed: May 2, 2008

**STIPULATION TO EXTEND THE
 TIME IN WHICH FREMONT
 INVESTMENT AND LOAN MAY FILE
 A RESPONSIVE PLEADING**

Trial Date: None set.


20 Plaintiffs, Timothy Losacco and Florence Losacco served their initial complaint
 21 on Defendant Fremont Investment and Loan on June 4, 2008, and Fremont's response to
 22 the initial complaint was due not later than June 24, 2008, the parties stipulated to a
 23 further continuance to enable settlement discussions to proceed. The additional
 24 continuance will expire on August 25, 2008, however the parties are still discussing
 25 resolution of this matter and therefore Plaintiffs, Timothy Losacco and Florence Losacco,
 26 and Defendant, Fremont Investment and Loan, do hereby stipulate by and through their
 27 respective counsel of record as follows:
 28

THE RYAN FIRM
A Professional Corporation

1 It is stipulated that the time in which Fremont has to answer or otherwise respond
2 to Plaintiffs' initial complaint be extended for an additional thirty (30) days from August
3 25, 2008, and that a facsimile signature may be considered an original for all purposes of
4 this stipulation.


5 DATED: August 21, 2008

THE RYAN FIRM
A Professional Corporation

6
7
8 By: 
9 TIMOTHY M. RYAN
10 BARRY G. COLEMAN
11 Attorneys for Defendant FREMONT
INVESTMENT AND LOAN

12 DATED: August 20, 2008

LAW OFFICES OF DEBORAH L.
RAYMOND

13
14
15 By: 
16 DEBORAH L. RAYMOND
17 Attorneys for Plaintiffs TIMOTHY
18 LOSACCO AND FLORENCE
19 LOSACCO
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

I am over the age of eighteen years and not a party to the within action. I am employed by The Ryan Firm, A Professional Corporation, whose business address is: 1100 North Tustin Avenue, Suite 200, Anaheim, California 92807.

On August 22, 2008, I served the within document(s) described as:
STIPULATION TO EXTEND THE TIME IN WHICH FREMONT INVESTMENT AND LOAN MAY FILE A RESPONSIVE PLEADING on the interested parties in this action:

- ☒ by placing ☐ the original ☒ true copy(ies) thereof enclosed in sealed envelope(s)
☒ addressed as follows: ☐ addressed as stated on the attached mailing list.

Name & Address	Telephone / Fax / E-mail	Role
Deborah L. Raymond, Esq. L/O Deborah L. Raymond 445 Marine View Avenue Suite 305 Del Mar, CA 92014 Solana Beach, CA 92075	Tel.: (858) 481-9559 Fax: (858) 724-0747 <u>draymond@lawinfo.com</u>	Counsel for Plaintiffs TIMOTHY LOSACCO and FLORENCE LOSACCO

- ☒ **BY MAIL** (Code Civ. Proc. § 1013(a))—I deposited such envelope(s) for processing in the mailroom in our offices. I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Anaheim, California, in the ordinary course of business. I am aware that on motion of a party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

- ☒ (Federal) I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on August 22, 2008, at Anaheim, California.


 TYLER J. KEMP